

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

ASHEVILLE DIVISION

JANE ROE,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil No. 1:20-cv-00066
)	
UNITED STATES OF AMERICA, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
)	
)	
)	

**PLAINTIFF’S EX PARTE MOTION TO PROCEED UNDER PSEUDONYM
AND TO SEAL PERSONALLY IDENTIFYING INFORMATION**

Plaintiff, Jane Roe, by and through her attorney, respectfully requests leave to proceed under a pseudonym and to seal related personally identifying employment history during the pre-trial stages of this proceeding. This motion is supported by an accompanying Memorandum of Law and Declaration of Plaintiff.

As detailed in Plaintiff’s Memorandum of Law, she asserts constitutional and civil rights claims against her prior employer and government officials and entities within the Fourth Circuit and the federal judiciary. During her employment as an attorney in the federal judiciary, Plaintiff suffered sexual harassment, retaliation, and discrimination, resulting in her constructive discharge. Prior to filing this civil action, Plaintiff filed a formal complaint under the Fourth Circuit’s Employment Dispute Resolution Plan. As a result, Defendants have actual or constructive knowledge of her identity.

Under these circumstances, the public disclosure of Plaintiff’s identity or personally identifying employment history—specifically, the identity of her employing office and its unit

executive—is unwarranted. If disclosed, the identification of Plaintiff’s employing office, its unit executive, and any other related identifying information would likely result in the incidental disclosure of Plaintiff’s identity, negating any opportunity for anonymity.

This motion is filed *ex parte* and prior to service on the Defendants. Plaintiff’s counsel is unable to consult with unknown counsel for the Defendants regarding their position on this motion. Plaintiff’s counsel, however, will serve this motion and supporting filings on defendants in conjunction with service of the redacted complaint.

For these and other reasons, Plaintiff respectfully requests that this Court grant her motion to proceed under a pseudonym and to seal related personally identifying employment history. Regarding the latter, Plaintiff specifically requests that this Court seal the (1) redacted complaint reference list and (2) employing office and unit executive summonses submitted for in camera review in conjunction with this motion, **prior to the Clerk’s docketing, granting of party access, or electronic issuing of those filings.**

This the 3rd Day of March, 2020.

Respectfully Submitted,

/s/ Cooper Strickland
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